EXECUTIVE SUMMARY - ENFORCEMENT MATTER

DOCKET NO.: 2007-1304-PST-E **TCEQ ID:** RN101642759 **CASE NO.:** 34438

RESPONDENT NAME: Sanya Investments, Inc. dba Fina Food Mart

ORDER TYPE:		
X_1660 AGREED ORDER	FINDINGS AGREED ORDER	FINDINGS ORDER FOLLOWING SOAH HEARING
FINDINGS DEFAULT ORDER	SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
_AMENDED ORDER	EMERGENCY ORDER	
CASE TYPE:		
AIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE
PUBLIC WATER SUPPLY	X PETROLEUM STORAGE TANKS	_OCCUPATIONAL CERTIFICATION
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION
SITE WHERE VIOLATION(S) OCCURS TYPE OF OPERATION: Convenience sto	RED: Fina Food Mart, 1821 West Tarrant Road, Granter with retail sales of gasoline	and Prairie, Dallas County
SMALL BUSINESS: X Yes	No	
OTHER SIGNIFICANT MATTERS: The facility location.	re are no complaints. There is no record of addition	al pending enforcement actions regarding this
INTERESTED PARTIES: No one other th	an the ED and the Respondent has expressed an inte	erest in this matter.
COMMENTS RECEIVED: The Texas Reg	gister comment period expired on January 22, 2008.	No comments were received.
Mr. Bryan Sinclair, Enforcement I Respondent: Mr. Durenayab Kha	r: Ms. Shontay Wilcher, Enforcement Division, Enfo	

b) Within 45 days after the effective date

of this Agreed Order, submit written

DOCKET NO.: 2007-1304-PST-E

VIOLATION SUMMARY CHART: CORRECTIVE ACTIONS VIOLATION INFORMATION PENALTY CONSIDERATIONS TAKEN/REQUIRED Dool / Type of Investigation: Total Assessed: \$13,700 Corrective Actions Taken: Complaint 1) The Executive Director recognizes that X Routine Total Deferred: \$2,740 the Respondent has implemented the Enforcement Follow-up X Expedited Settlement following corrective measures at the Records Review Station: Financial Inability to Pay Date(s) of Complaints Relating to this Case: None SEP Conditional Offset: \$0 a. Properly anchored the shear valves on dispenser nos. 1/2, 3/4, and 5/6 on June 28, 2007: Date of Investigation Relating to this Total Paid (Due) to General Revenue: \$310 Case: June 25, 2007 (remaining \$10,650 due in 34 monthly b. Began conducting daily and monthly payments of \$310 each and one final payment inspections of the Stage II vapor recovery Date of NOV/NOE Relating to this Case: of \$110) July 6, 2007 (NOE) system on July 27, 2007; **Site Compliance History Classification** c. Submitted documentation verifying that Background Facts: This was a routine ___ High <u>X</u> Average __ Poor all current employees completed in-house investigation. Nine violations were Stage II vapor recovery training on July 6, documented. **Person Compliance History Classification** 2007: __ High X Average __ Poor WASTE Major Source: Yes X No d. Began maintaining the required Stage II records at the Station on July 27, 2007; 1) Failure to provide a release detection method capable of detecting a release from Applicable Penalty Policy: September 2002 any portion of the underground storage e. Conducted the annual testing of the tank ("UST") system which contained Stage II equipment on June 25, 2007 and the system passed; and regulated substances [30 Tex. ADMIN. CODE § 334.50(a)(1)(A) and TEX. WATER d. Upgraded the Stage II vapor recovery CODE § 26.3475(c)(1)]. system to ORVR compatible system on July 30, 2007. 2) Failure to properly install and maintain a secure anchor at the base of each UL-**Ordering Provisions:** listed emergency shutoff valve in a piping system in which regulated substances are conveyed under pressure to an 2) The Order will require the Respondent aboveground dispensing unit. Specifically, the shear valves were not properly anchored under dispenser nos. 1/2, 3/4, a) Within 30 days after the effective date and 5/6 [30 Tex. ADMIN. CODE § of this Agreed Order: 334.45(c)(3)(A)]. i. Install and implement a release detection 3) Failure to provide an amended method for all USTs at the Station; registration for any change or additional information regarding USTs within 30 ii. Submit an amended UST registration days from the date of the occurrence of the form to indicate the current release change or addition. Specifically, the detection method and capacity of the UST registration was not updated to reflect the system; and current release detection method and tank capacity for the USTs at the Station [30 iii. Appropriately mark the top of each fill TEX. ADMIN. CODE § 334.7(d)(3)]. tube or nonremovable point in the immediate area of the fill tube of each 4) Failure to ensure that a legible tag, label, or marking with the tank number is permanently applied upon or affixed to

either the top of the fill tube or to a

KESPONDENI	DOCKET NO.: 2007-1304-PST-E	Tage 5 c
nonremovable point in the immediate area of the fill tube according to the UST registration and self-certification form [30 Tex. Admin. Code § 334.8(c)(5)(C)].		certification and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.i through 2.a.iii.
5) Failure to conduct daily and monthly inspections of the Stage II vapor recovery system [30 Tex. Admin. Code § 115.244(1), (3), and Tex. Health & Safety Code § 382.085(b)].		
6) Failure to ensure that at least one station representative receives training and instruction in the operation and maintenance of the Stage II vapor recovery system, and each current employee receives in-house Stage II vapor recovery training regarding the purpose and operation of the Stage II equipment [30 Tex. Admin. Code § 115.248(1) and Tex. Health & Safety Code § 382.085(b)].		
7) Failure to maintain all required Stage II records at the Station and make them immediately available for review upon request by agency personnel. Specifically, the Respondent did not maintain a copy of the California Air Board Executive Order and the maintenance records for the Stage II vapor recovery system [30 Tex. ADMIN. CODE § 115.246(1), (3), and Tex. Health & Safety Code § 382.085(b)].		
8) Failure to verify proper operation of the Stage II equipment at least once every 12 months. Specifically, the Stage II annual compliance testing had not been conducted [30 Tex. Admin. Code § 115.245(2) and Tex. Health & Safety Code § 382.085(b)].		

Additional ID No(s).: PST 26260

9) Failure to update the Stage II vapor recovery system to onboard refueling vapor recovery ("ORVR") compatible system [30 Tex. Admin. Code § 115.242(1)(C) and Tex. Health & Safety

CODE § 382.085(b)].

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	Penalty Calculation	n Worksheet (Po	•	
Policy Revision 2 (Septe	ember 2002)		PCV	V Revision June 26, 2007
DATES Assigned	9-Jul-2007	THE CONTRACTOR OF THE CONTRACT		
PCW		EPA Due		
RESPONDENT/FACILITY	INFORMATION			Section 1 and 1 an
Respondent Reg. Ent. Ref. No.	Sanya Investments, Inc. dba Fina Food Mar	<u>t</u>	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Facility/Site Region		Major/Minor Source	Minor	•
i				
CASE INFORMATION Enf./Case ID No.	24420	No. of Violations	0	
	2007-1304-PST-E	Order Type		
	Petroleum Storage Tank	Enf. Coordinator	Shontay Wilche	
Multi-Media			EnforcementTe	am 6
Admin. Penalty \$ L	imit Minimum \$0 Maximum	\$10,000		
	Penalty Calcula	ation Section		
TOTAL BASE PENAL	TY (Sum of violation base penaltic		Subtotal 1	\$12,000
				kan na afarangan kan la
ADJUSTMENTS (+/-)	TO SUBTOTAL 1 ned by multiplying the Total Base Penalty (Subtotal 1) by	the indicated percentage		
Compliance Histo		Enhancement Subte	otals 2, 3, & 7	\$600
· .				
Notes	Enhancement for one Notice of Violation wit	th same or similar violations.		-
Culpability	No 0%	Enhancement	Subtotal 4	\$0
Notes	The Respondent does not meet the	e culpability criteria.		·
Good Faith Effort	t to Comply 0%	Reduction	Subtotal 5	\$0
Good Faith Ellon	Before NOV NOV to EDPRP/Settlement Offer	1 Troducijon		
Extraordinary				
Ordinary N/A	X (mark with x)			MAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA
IN/A			1	(A.) (Approx
Notes	The Respondent does not meet the	e good faith criteria.]	AND STREET CONTRACTOR OF THE STREET CONTRACTOR
	0%	Enhancement*	Subtotal 6	\$0
Approx.	Total EB Amounts \$1,317 *Capped Cost of Compliance \$6,400	d at the Total EB \$ Amount	_	THE SHARE OF THE S
				\$12,600
SUM OF SUBTOTAL	S 1-7	·	Final Subtotal	\$12,600
	S JUSTICE MAY REQUIRE Subtotal by the indicated percentage. (Enter number onli	9% ly; e.g30 for -30%.)	Adjustment	\$1,100
	Recommended enhancement to capture as			onegranosoooo
Notes	the violations.			108.0100.000000000000000000000000000000
		Final Pe	nalty Amount [\$13,700
CTATUTODY LIMIT /	AD HICTMENT	Einal Acad	essed Penalty	\$13,700
STATUTORY LIMIT A	ADJUS I MENT	Fillal ASS	esseu Fellally [410,7.00
DEFERRAL		20% Reduction	Adjustment	-\$2,740
	nalty by the indicted percentage. (Enter number only; e.	g. 20 for 20% reduction.)	7	
Natas	Deferred effered for expedite	ad sattlement		
Notes	Deferral offered for expedite	su somement.		
DAVADI E DENALTV			Γ	\$10,960
PAYABLE PENALTY				7.0,500

Screening Date 16-Jul-2007

Docket No. 2007-1304-PST-E

PCW

Respondent Sanya Investments, Inc. dba Fina Food Mart

Policy Revision 2 (September 2002) PCW Revision June 26, 2007

Case ID No. 34438

Reg. Ent. Reference No. RN101642759

		Compliance History Worksheet			
omp			inter Number Here	ୁରହା Adjust.	
	NOVs	Number of Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	1	5%	
		Other written NOVs	0	0%	
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0,	0%	
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	region mad p	0%	
	Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%	
	and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%	
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	
	State of the state	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	1 (434.00) 1 (0) 1 (1) (1)	0%	
÷	Audits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%	
		Pleas	se Enter Yes or No		
		Environmental management systems in place for one year or more	No	0%	
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	
	Other	Participation in a voluntary pollution reduction program	No	0%	
	Management of the second secon	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
		Adjustment Po	ercentage (Su	ıbtotal 2)	5
epe	at Violator (Su	btotal 3)		OTHIO	
	No	Adjustment Po	ercentage (Su	ıbtotal 3)	0
ome	oliance History	Person Classification (Subtotal 7)			
10.000	Average P		ercentage (Su	ıbtotal 7)	0
omp	oliance History		- ,	· —	
	Compliance	Telegraphic Charles of the Charles o			
	History Notes	Enhancement for one Notice of Violation with same or similar violations.	: 1		
	Notes	prejedije u prejedije i prejeda projekterakati.	A company of the second		

Screening Date	16-Jul-2007	Docket No	o. 2007-1304-PST-E	PCW
Respondent	Sanya Investments, Inc.	dba Fina Food Mart	Polic	y Revision 2 (September 2002)
Case ID No.	34438			PCW Revision June 26, 2007
Reg. Ent. Reference No.				Siconotatilias
	Petroleum Storage Tank			oon and do oo
Enf. Coordinator			9	ELLIOT OPERA.
Violation Number				-
Rule Cite(s)	30 Tex. Admin. Cod	de § 334.50(a)(1)(A) and Te	ex. Water Code § 26.3475(c)(1)	
Violation Description		ase detection method capa UST system which contain	ble of detecting a release from an ed regulated substances.	ру
			Base Pena	Ity \$10,000
>> Environmental, Property	Harm e Major Moderate			
OR Actua Potentia			Percent 25%	-
>>Programmatic Matrix	Majar	a Minor		
Falsification	Major Moderate	e Minor	Percent 0%	
1			- 070	
Matrix Notes Human hea	alth or the environment wil e protective of human hea	ll or could be exposed to po llth or environmental recept	ollutants which would exceed level tors as a result of the violation.	S Comments
			Adjustment \$7,5	500
	A SOLDER AL GRAVICA, TO LICENS MAN MECHANISM SERVER			40.500
				\$2,500
Violation Events				
Number of V	iolation Events 1	21	Number of violation days	neadd-0000 Digit
mark only one with an x	daily monthly quarterly semiannual annual single event		Violation Base Pena	**************************************
	2007 investigatio	l based on documentation n date to the July 16, 2007		
Economic Benefit (EB) for the	nis violation	No. of the second secon	Statutory Limit Test	Appropriate Committee Comm
Estimate	ed EB Amount	\$88	Violation Final Penalty To	otal \$2,854
		This willed - First A -	anned Denothy (adjusted for the	its) \$2,854
		inis violation Final Ass	essed Penalty (adjusted for lim	1L3/1 \$2,034

Case ID No	1, 34438						
	100						
Reg. Ent. Reference No					The State of the State of		
	a Petroleum Stora	age Tank				Percent Interest	Years of
Violation No	. 1			7 0 A 10 00 00		Jajan Baran da Serias,	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Kam Davallatie	. For will Definite it				alia Alfunda III.	Carlotti Terreriya	
item pescription	11 No commas or \$		Maria Carlo Scrient	arallanijiyi	BRING THE	Table 18 can as same	
· · · · · · · · · · · · · · · · · · ·		SE CONTROL PROBLEMANTE PROBLEM					
Delayed Costs	S TRACES AND A STREET	1	e de astrones	1 00	\$0	\$0	\$0
Equipment			The Principle of the Control	0.0	\$0	\$0	\$0
Buildings	\$1,500	25-Jun-2007	25-Apr-2008	0.8	\$4	\$84	\$88
Other (as needed)	\$1,000	20-Juli-2007	20-Apr-2000	0.0	\$0	\$0	\$00
Engineering/construction Land			M	0.0	\$0	n/a	\$0 \$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling			 	0.0	\$0	n/a	\$0
Remediation/Disposal			I say the say of the s	0.0	\$0	n/a	\$0
Permit Costs		ngermorg viga.		0.0	\$0	n/a	\$0
Other (as needed)	State of the State	pour des paperes de la compa	June 16 to 18 to 1	0.0	\$0	n/a	\$0
	E0000000000000000000000000000000000000	And Annual Control of the Control of the Control					
	All Carlot and the second		7.4 m. s Wilson	addan a	Richard Barra	1 1 2	
	Estimated cos	t to provide releas	e detection for the	UST svs	stem at the Station	n istainawan 11 ta 8a 8a	d is the date of
Notes for DELAYED costs	Estimated cos					i. The Date Require	d is the date of
Notes for DELAYED costs	Estimated cos		e detection for the ation and the Final			i. The Date Require	d is the date of
COUNTY OF STATE ASSUMEDANCE SECTION ASSUME		the investiga	tion and the Final	Date Is	the expected date	. The Date Require of compliance.	
Avoided Cost		the investiga	tion and the Final	Date is ntering	the expected date	n. The Date Require of compliance.	osts)
Avoided Cost		the investiga	tion and the Final	Date Is to ntering	the expected date item (except for \$0	n. The Date Require of compliance. one-time avoided c	osts) \$0
Avoided Cost: Disposal Personnel		the investiga	tion and the Final	ntering	item (except for \$0 \$0	one-time avoided c	osts) \$0 \$0
Avoided Cost Disposal Personnel Inspection/Reporting/Sampling		the investiga	tion and the Final	ntering 0.0 0.0 0.0	item (except for \$0 \$0 \$0	one-time avoided c	osts) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment		the investiga	tion and the Final	ntering 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0	one-time avoided c	s0 \$0 \$0 \$0 \$0
Avoided Cost: Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		the investiga	tion and the Final	ntering 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
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Avoided Cost: Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		the investiga	tion and the Final	ntering 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		the investiga	ation and the Final	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		the investiga	ation and the Final	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		the investiga	ation and the Final	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		the investiga	ation and the Final	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		the investiga	ation and the Final	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		the investiga	ation and the Final	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n. The Date Require of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screenii	ng Date 16-Jul-2007	Docket No. 2007-1304-PST-E	PCW
Resp	ondent Sanya Investmen	ts, Inc. dba Fina Food Mart	Policy Revision 2 (September 2002)
Case	ID No. 34438		PCW Revision June 26, 2007
Reg. Ent. Refere	nce No. RN101642759		
Media [Statute] Petroleum Storag	e Tank	
Enf. Coor	dinator Shontay Wilcher	:	
Violation	<u> </u>		
Ru	le Cite(s)	30 Tex. Admin. Code § 334.45(c)(3)(A)	

Violation De	scription emergency shutch	orly install and maintain a secure anchor at the base of each UL off valve in a piping system in which regulated substances are conton an aboveground dispensing unit. Specifically, the shear valve properly anchored under dispenser nos. 1/2, 3/4, and 5/6.	conveyed
		Base	Penalty \$10,000
>> Environmental, Pr	operty and Human He		
A arrestana s	Delegge Major M	Harm loderate Minor	
OR	Release Major M	loderate Minor	
	Potential	x Percent 10%	
		** *** *** *** *** *** *** *** *** ***	
>>Programmatic Mat	. 40 10		
Fa	sification Major M	loderate Minor Percent 0%	
L		Ferceit 078	
Matrix Notes Hu	ıman health or the environn uld not exceed levels that a	nent will or could be exposed to significant amounts of pollutant re protective of human health or environmental receptors as a the violation.	ts which result of
in Million (1985) San San San San San San San San San San		Adjustment	\$9,000
	ti () o 1 % (Angolius S.). Cha talah kanada ke sebagai katabat	ekanti di katantan kanan da	
			\$1,000
Violation Events	THE CONTRACTOR OF THE PROPERTY OF THE	is no contrase estado e sociale de describir estado en Malabolo de	
Violation Events	indiadionki (1965) ili ali aconominationi ali a	and the state of the	<u>. </u>
Nur	nber of Violation Events	1 Number of violation day	'S
	n walker to the second		
	daily		
ma	monthly nothly quarterly	X Violation Base	e Penalty \$1,000
i contract the second s	with an x semiannual		
	annual		
	single event		
		nmended based on documentation of the violation during the June 1997	une 25,
	2007 inves	stigation date to the June 28, 2007 compliance date.	
Economic Benefit (E	B) for this violation	Statutory Limit Tes	st
The state of the s	Estimated EB Amount	\$0 Violation Final Pen	alty Total \$1,142
	B0000000	This violation Final Assessed Departs / editors of	for limits) \$1,142
		This violation Final Assessed Penalty (adjusted f	or mais)

Case ID No. 3	RN101642759					,	vila de
Media F Violation No. 2	Petroleum Stora 2	age Tank				Percent Interest	Years of Depreciation
						5.0	15
Item Description	Item Cost No commas or \$	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs		n de la companya de La companya de la co					
Equipment	\$100	25-Jun-2007	28-Jun-2007	0.0	\$0	\$0	\$0
Buildings	ANGERSON P. 10.		g 1000 Militari ili.	0,0	\$0	\$0	\$0
Other (as needed)			Con Logist	0.0	\$0	\$0	\$0
Engineering/construction	Addition of the control of the contr			0.0	\$0	\$0	\$0
Land [0,0	\$0	n/a	\$0
Record Keeping System	16.0		بموروس مستوري المنازية	0.0	\$0	n/a	\$0
Training/Sampling				0,0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
		100 TO 10					
Permit Costs	er er i er verkirioski	1.214.1 1.211.1	And the Administration of the Control	0.0	\$0	man, n/a	\$0
Other (as needed)	Estimated cos	st to properly install		0.0 0.0 hors. Th	\$0 \$0 e Date Required		\$0 \$0 5.110 - 20.015 (10.37.03.55)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			the Final Date	0.0 0.0 hors. The sthe date ntering in 0.0 0.0 0.0 0.0	\$0 \$0 e Date Required b of compliance. tem (except for \$0 \$0 \$0 \$0	is the date of the invoiced cone-time avoided co	\$0 \$0 vestigation and osts) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			the Final Date	0.0 0.0 hors. The sthe date of the date of	\$0 \$0 \$0 e Date Required b of compliance. tem (except for \$0 \$0 \$0 \$0	n/a n/a is the date of the inv one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 vestigation and so \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			the Final Date	0.0 0.0 hors. The sthe date ntering in 0.0 0.0 0.0 0.0	\$0 \$0 e Date Required b of compliance. tem (except for \$0 \$0 \$0 \$0	is the date of the invoiced cone-time avoided co	\$0 \$0 vestigation and osts) \$0 \$0 \$0 \$0

Screening Dat	e 16-Jul-2007 Docket No. 2007-1304-PST-E	PCW
_		v Revision 2 (September 2002)
Case ID No	o. 34438	PCW Revision June 26, 2007
Reg. Ent. Reference No	RN101642759	
Media [Statute	Petroleum Storage Tank	
Enf. Coordinate	r Shontay Wilcher	
Violation Number		
Rule Cite(s	30 Tex. Admin. Code § 334.7(d)(3)	
Violation Descriptio	detection method and tank capacity for the USTs at the Station.	
	Base Penal	lty \$10,000
>> Environmental, Property	and Human Health Matrix	:
	Harm	
Releas		
OR Actu Potenti		
Potenti		
>>Programmatic Matrix		
Falsificatio	n Major Moderate Minor	
	x Percent 10%	
range W		
Matrix Notes	100% of the rule requirement was not met.	
	Adjustment \$9,0	00
POST OF STATE OF STAT	•	\$1,000
		ψ1,000
Violation Events		
	COLDER, A Exclusive COLD E- destructions des cristales escoperations required to a requirement of a set of excess research of a set of excess research of a set of excess representation of excess represen	
Number of	Violation Events 1 21 Number of violation days	
	248 4 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
	daily monthly	
mark only or with an x	Violation Boso Bono	\$1,000
One singl	e event is recommended based on documentation of the violation during the June 25, 200 investigation date.	07
Economic Benefit (EB) for	this violation Statutory Limit Test	
\$50000 (Light 19 ch 18 had 18 ch 19	指的"大学的主义"的"我们是是是"对自己的"大学的"的"大学的"的"大学的"的"大学的"的"大学"的"大学"的"大学"的	ermaerneturumummaniskietik jelocarii 479.200
Estima	ted EB Amount \$4 Violation Final Penalty To	otal \$1,142
	This violation Final Assessed Penalty (adjusted for lim	its) \$1,142
AND THE RESIDENCE OF THE PROPERTY OF THE PROPE		British (1977)

		ents, Inc. dba Fina	Food Mart				
Case ID No.		•				a state of	
Reg. Ent. Reference No.					28.40		
Media Violation No.	i, Petroleum Stora . 3	age Tank				Percent Interest	Years of Depreciation
		11 11400			oranomentus voides	5.0	1
e sy topologia Nika Newyot	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$		nimb/ Lea Off				
Delayed Costs	PRESIDENTIAL PROPERTY CONTRACTOR	AGUNTANOS ASSESSAS CONTRACTOR OF THE	trongeristand in elementativ	1700	A 101 100 100 100 100 100 100 100 100 10	T	
Equipment	and the state of the state of		regretation and the second	0.0	\$0	\$0	\$0
Buildings		tactors to story	4,610,717,751 - 1,410	0,0	\$0	\$0 \$0	\$0
Other (as needed)	4.5.50 Sac. 34.5		Sticker (St. L. S. S. S. S. S. S.	0.0	\$0	\$0	\$0 \$0
Engineering/construction		100000000000000000000000000000000000000	manda e a cara de la caración de la	0.0	\$0 \$0	η	\$0 \$0
Land Record Keeping System				0.0	\$0	n/a	\$0 \$0
Training/Sampling				0.0	\$0	n/a	\$0 \$0
Remediation/Disposal				0.0	\$0	n/a	\$0 \$0
Permit Costs				0.0	\$0	n/a	\$0
	0.400	OF 1 0007		0.8	\$4	n/a	\$4
Other (as needed)	\$100 Estimated	25-Jun-2007	prepare and subm	4898 BAAR	regard pelakterakt	ক্ষেত্ৰ প্ৰকৃতি প্ৰকৃতি কৰিছে কৰিছে	মন্ত্ৰিক কাল কৰিব কৰা সংগ্ৰহ
Notes for DELAYED costs	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upo ate is tr	dated UST registrate estimated date	ation. The Date Req of compliance.	uired is the
Notes for DELAYED costs Avoided Costs	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upc ate is th	dated UST registrate estimated date	ation. The Date Req of compliance.	uired is the
Notes for DELAYED costs Avoided Costs Disposal	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upo ate is th ntering 0,0	dated UST registrate estimated date	ation. The Date Req of compliance. one-time avoided c	uired is the osts)
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upo ate is th ntering 0.0 0.0	dated UST registrate estimated date	ation. The Date Req of compliance.	uired is the osts) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upo ate is th ntering 0.0 0.0	dated UST registrate estimated date	ation. The Date Req of compliance.	uired is the osts) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upo ate is th ntering 0,0 0,0 0,0	dated UST registrate estimated date item (except for \$0 \$0 \$0 \$0 \$0	ation. The Date Req of compliance. one-time avoided c \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upo vate is the ntering 0.0 0.0 0.0 0.0	dated UST registrate estimated date Item (except for \$0 \$0 \$0 \$0 \$0 \$0	ation. The Date Req of compliance.	uired is the SO SO SO SO SO SO SO
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated	cost to accurately investigation	prepare and subm n date. The Final D	it an upo ate is th ntering 0,0 0,0 0,0	dated UST registrate estimated date item (except for \$0 \$0 \$0 \$0 \$0	ation. The Date Req of compliance. one-time avoided c \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated	cost to accurately investigation	prepare and subm n date. The Final D ed costs before e	t an upo ate is tr ntering 0.0 0.0 0.0 0.0 0.0	tated UST registrate estimated date item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ation. The Date Req of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	uired is the SO SO SO SO SO SO SO S
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated	cost to accurately investigation	prepare and subm n date. The Final D ed costs before e	ntering 0.0 0.0 0.0 0.0 0.0 0.0	tated UST registrate estimated date item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ation. The Date Req of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated	cost to accurately investigation	prepare and subm n date. The Final D ed costs before e	ntering 0.0 0.0 0.0 0.0 0.0 0.0	tated UST registrate estimated date item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ation. The Date Req of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	uired is the SO SO SO SO SO SO SO S
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) Notes for AVOIDED costs	Estimated	cost to accurately investigation	prepare and subm n date. The Final E ed costs before e	ntering 0.0 0.0 0.0 0.0 0.0 0.0	tated UST registrate estimated date item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ation. The Date Req of compliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	uired is the SO SO SO SO SO SO SO S

	Screening Date	16-Jul-2007	Docket No. 2007-1	304-PST-E	PCW
Reg. Ent. Reference No. RN101642759 Madia [Statute] Petroleum Storage Tank Enf. Coordinator Shonlay Wilcher Violation Number Rule Cite(s) Shonlay Wilcher	•		, Inc. dba Fina Food Mart	Policy Re	vision 2 (September 2002)
Media (Statute) Petroleum Storage Tank Enf. Coordinator Snortary Wilcher Violation Number Rule Cite(s) Falicd to ensure that a legible tag, label, or marking with the tank number is permanently applied upon or affixed to either the top of the fill tube or to a nonremovable point in the immediate area of the fill tube according to the UST registration and self-certification form. Base Penalty Stid,000 Senvironmental, Property and Human Health Matrix Hum Rolease Major Moderate Minor OR Actual Potential Potential Potential Potential Adjustment Falsification Major Moderate Minor Percent 10% Adjustment Sp.,000 Violation Events Number of Violation Events Number of Violation Events Number of Violation Events One single event is recommended based on documentation of the violation during the June 25, 2007 investigation date. Economic Benefit (EB) for this violation Estimated EB Amount St. Violation Final Penalty Total St.,142				PG	W Revision June 26, 2007
Enf. Coordinator Shonky Wicher Violation Number 4 Rule Cite(s) So Tex. Admin. Code § 334.8(c)(5)(C) Falied to ensure that a legible tag, label, or marking with the tank number is permanently applied upon or affixed to either the top of the fill tube or to a nonremovable point in the immediate area of the fill tube according to the UST registration and self-certification form. Base Penalty S10,000	1				
Violation Number 4 30 Tex. Admin. Code § 334.8(c)(5)(C) Violation Description Falied to ensure that a legible tag, label, or marking with the tank number is permanently applied upon or affixed to either the top of the fill tube or to a nonremovable point in the immediate area of the fill tube according to the UST registration and self-certification form. Base Penalty \$10,000 >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Percent 0% >> Programmatic Matrix Falsification Major Moderate Minor Percent 10%	:		Tank	•	THE PROPERTY OF THE PROPERTY O
Violation Description Failed to ensure that a legible tag, label, or marking with the tank number is permanently applied upon or affixed to either the top of the fill tube or to a norremovable point in the immediate area of the fill tube according to the UST registration and self-certification form. Base Penalty					
Failed to ensure that a legible tag, label, or marking with the tank number is permanently spinled upon or affised to either the top of the fill tube or to a norremovable point in the immediate area of the fill tube according to the UST registration and self-certification form. Base Penalty		<u> </u>			
Violation Description applied upon or affixed to either the top of the fill tube or to a nonremovable point in the immediate area of the fill tube according to the UST registration and self-certification form. Base Penalty \$10,000	Rule Cite(s)		30 Tex. Admin. Code § 334.8(c)(5)(C)	
>> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor OR Actual Potential Potential Percent 0% >>Percent 10% Matrix Notes 100% of the rule requirement was not met.	Violation Description	applied upon or af	fixed to either the top of the fill tube or to a r of the fill tube according to the UST registrat	nonremovable point in the ion and self-certification	
OR Actual Potentia Percent 0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 10% Matrix Notes 100% of the rule requirement was not met. Adjustment \$9,000 \$1,000 Violation Events Number of Violation Events 1 21 Number of violation days daily monthly quarterly quarterly quarterly quarterly semiannual single event x One single event is recommended based on documentation of the violation during the June 25, 2007 investigation date. Economic Benefit (EB) for this violation Estimated EB Amount \$4 Violation Final Penalty Total \$1,142	THE STATE OF THE S	Н	larm	Base Penalty	\$10,000
Falsification Major Moderate Minor Percent 10%	OR Actua			nt 0%	
Matrix Notes Number of Violation Events 1	>>Programmatic Matrix				
Matrix Notes 100% of the rule requirement was not met.		Major Mo		p	
Notes Adjustment \$9,000 \$1,000 Violation Events Number of Violation Events Adjustment \$1,000 \$1,000 Violation Events Violation Base Penalty One single event is recommended based on documentation of the violation during the June 25, 2007 investigation date. Economic Benefit (EB) for this violation Estimated EB Amount \$4 Violation Final Penalty Total \$1,142		X	Percei	nt 10%	,
Violation Events Number of Violation Events 1	(Control of the Control of the Contr	10		nent \$9,000	
Number of Violation Events 1 21 Number of violation days Mark only one with an x Wiolation Base Penalty \$1,000				Ī	\$1,000
monthly quarterly semiannual annual single event x One single event is recommended based on documentation of the violation during the June 25, 2007 investigation date. Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$4 Violation Final Penalty Total \$1,142	会会を目前を2000年度が2000年度が14年の対象を200分に対象を200分によりません。これを中の中部の14年の日本のようかようからない。本年は本が2000年度を2000年度が2000年度を2000年度を2000年度を2000年度が2000年度が2000年度を2000年	iolation Events	1 21 Number	er of violation days	
investigation date. Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$4 Violation Final Penalty Total \$1,142	-	monthly quarterly semiannual annual	X	Violation Base Penalty	\$1,000
Estimated EB Amount \$4 Violation Final Penalty Total \$1,142	One single	event is recommend		during the June 25, 2007	
	Economic Benefit (EB) for the	nis violation	Statu	itory Limit Test	oden 1979 periode av Signatur Historian et en
	Estimate	ed EB Amount	\$4]. Vic	lation Final Penalty Total	\$1,142
	地震影響 (新聞歌歌歌名 25/25/12) 中华 中华 2013年 25/25/25 中华 2013年			nalty (adjusted for limits)	\$1,142

	F Sanya Investme	ents, Inc. dba Fina				a part grand	40,00
Case ID No	19	sitto, irio. aba i iria	Ood Wart				
Reg. Ent. Reference No	Ts.					and the first of	
	a Petroleum Stor	ago Tonk			• 27 - 17 - 17		Years of
		age rank		* 4	*	Percent Interest	Depreciation
Violation No	#4 ·	TO A CANTER OF SHIRING MERCANDING THE PARTY.	945 297, 1651 275 A. 1128 H.		1488648441484644		100 to
		actorollicaniles con-				5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	n No commas or \$	gweye day al bad y				padodin	
The state of the s	TWO THE THE PROPERTY OF THE PARTY OF THE PAR	Design control of the Landson	Production (Control of Control of				
Delayed Costs	5					E ar	
Equipment	Makingha A. J. T. T.			0,0	\$ 0	\$0	\$0
Buildings	ESTERNA PER LE	(Charles March		0.0	\$0	\$0	\$0
Other (as needed)	Part of the			0,0	\$0	10.01(\$00:300.11)	\$0
Engineering/construction	nderbyjn, Maria			0,0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	. Landa Land			0.0	\$0	n/a	\$0
Training/Sampling			- 1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	0.0	\$0	n/a	\$0
Remediation/Disposal		13.45		0.0	\$0	n/a	\$0 ***
Permit Costs Other (as needed)	\$100	25-Jun-2007	25-Apr-2008	0.0	\$0 \$4	n/a n/a	\$0 \$4
				等 (44) (4) (4)	restantiament in the	हर्षा हरते. पुरस्का करा प्रस्ता है	
	Estimated cos	t to label the tank fi	ll ports. The Date	Require	d is the date of the	investigation and th	ne Final Date i
Notes for DELAYED costs Avoided Costs	The state of the s		the expecte	d date o	f compliance. Item (except for	illustration avoided c	osts)
Avoided Costs	The state of the s		the expecte	d date o	f compliance. item (except for \$0	one-time avoided c	osts) \$0
Avoided Costs Disposal Personnel	The state of the s		the expecte	ntering	f compliance: item (except for \$0 \$0	one-time avoided c	osts) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	The state of the s		the expecte	ntering 0.0 0.0 0.0	f compliance. Item (except for \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0	osts) \$0 \$0 \$0
Avoided Costs Disposal Personnel Personnel Inspection/Reporting/Sampling Supplies/equipment	The state of the s		the expecte	ntering 0.0 0.0 0.0 0.0	f compliance: item (except for \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	The state of the s		the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0	Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	The state of the s		the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	f compliance: item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sone-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	The state of the s		the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0	Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0	sots) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	The state of the s		the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	f compliance: item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	The state of the s	UALIZE [1] avoide	the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	f compliance: item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	The state of the s	UALIZE [1] avoide	the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	f compliance: item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	S ANN	UALIZE [1] avoide	the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	f compliance: item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	The state of the s	UALIZE [1] avoide	the expecte	ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	f compliance: item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date 16-Jul-2007 Docket No. 2007-1304-PST-E	PCW
Respondent Sanya Investments, Inc. dba Fina Food Mart	licy Revision 2 (September 2002)
Case ID No. 34438	PCW Revision June 26, 2007
Reg. Ent. Reference No. RN101642759	
Media [Statute] Petroleum Storage Tank	
Enf. Coordinator Shontay Wilcher	
Violation Number 5	
Rule Cite(s) 30 Tex. Admin. Code § 115.244(1), (3), and Tex. Health & Safety Code § 382.085	b).
Violation Description Failed to conduct daily and monthly inspections of the Stage II vapor recovery system Base Per >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor OR Actual Potential X Percent 10%	m.
>>Programmatic Matrix	
Falsification Major Moderate Minor	
Percent 0%	
Matrix Notes Human health or the environment will or could be exposed to significant amounts of pollutants who would not exceed levels that are protective of human health or environmental receptors as a result the violation. Adjustment \$5	ich It of
	\$1,000
Violation Events Number of Violation Events 1 21 Number of violation days daily	
monthly mark only one with an x semiannual annual single event	\$1,000
One quarterly event is recommended based on documentation of the violation during the June 2 2007 investigation date to the July 16, 2006 screening date.	25,
Economic Benefit (EB) for this violation Statutory Limit Test	
	Total \$1 142
Economic Benefit (EB) for this violation Estimated EB Amount \$105 Violation Final Penalty	Total \$1,142 mits) \$1,142

	anakasi n U. Bi	conomic l	Benefit W	orks	sheet	Bricks, Louises	708
Respondent	Sanya Investme	ents, Inc. dba Fina	Food Mart		ander Bassassander Guerra V. Eksternis	As a commission of the second state of the second	
Case ID No.						Company of the second	
Reg. Ent. Reference No.	RN101642759						
Media	Petroleum Stora	age Tank				Percent Interest	Years of
Violation No.	5				e and a	r ercent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
					illierest Saveu	Chethile Costs	ED AIIIOUIII
Item Description	No commas or \$	Spylesty, colling		output Systemania	etorio e de torio o della colta della	etali, manana	
In the contract of the co	reeka inggo oo tiriinaaniinees		and a contract the contract secretary			a sed a constant	
Delayed Costs_	Additional and the second	Action and decision and the Bank	(A)		national property		
Equipment			Harris and the state of the sta	0,0	\$0	\$0	\$0
Buildings	والروف والمستحر المناف	أنع والترويية ووالرا	Annual Control of Control	0.0	\$0	\$0	\$0
Other (as needed)	ACCOUNTS OF THE PROPERTY OF TH	* in the second of the second	Brail Asset and Strain	0.0	\$0	\$0	\$0
Engineering/construction	أعبين أرابا		Section Annual Control of the Control	0,0	\$0	\$0	\$0
Land				0,0	\$0	n/a	\$ 0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	de la companya di di contra		The second second	0.0	\$0	n/a n/a	\$0 \$0
			ta si si na si Nastita Apalian de a	II 0.0	\$0	1 1/2	50
Other (as needed)	Annual III and Sabata Care III	Hain Kadharan maka e ase	5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 -	Maria and a	COURSE FOR STREET	State Appropriation	
Other (as needed)	All philips of the Li	Mikalakadade usha u salel Suur	v rest to the principal to	Staff Sym Ridges 6 Rate	ស្តែលមានទេ ២៩១៧ ១៩២១៛២៤ ២ -ជា	States of the Catalon and	
,		Start Control of the		Sid of Pass Service	ri	esec us religions d	
Notes for DELAYED costs		Historical new male ment and an emile	E Person	200 (27 1 25) 1870() 1721()	ri	osemoji	Page Page Page Property
,		Michigan was a war			ri	esec us religions d	
Notes for DELAYED costs	ANN	UALIZE [1] avoid	ed costs before e		e ev rojski en la a	osemoji	\$ \$ 1 (2. 14) \$ 12 14 17 17 17 17 17 17 17
,	ANN	UALIZE [1] avoid	ed costs before e		e ev rojski en la a	មមាន មាន មាន ស្រា (មានសេស) (ព្រះសេស)	\$ \$ 1 (2. 14) \$ 12 14 17 17 17 17 17 17 17
Notes for DELAYED costs Avoided Costs	ANN	UALIZE [1] avoid	ed costs before e	entering	ow night	Gesulos Gesulos Jisbook one-time avoided c	osts)
Notes for DELAYED costs Avoided Costs Disposal	ANN	UALIZE [1] avoid	ed costs before e	entering	item (except for	ovedovi ovedovi jisbbo\ one-time avoided c \$0 :	osts) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	ANN	UALIZE [1] avoid	ed costs before e	entering 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0	one-time avoided c	osts) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	ANN	UALIZE [1] avoid	ed costs before e	0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0	Ossofos) globas one-time avoided c \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	ANN	UALIZE [1] avoid	ed costs before e	entering 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c	osts) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	\$100	UALIZE [1] avoid	ed costs before e	0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Octobrosis protections one-time avoided c \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]				entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	0sast63 	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$100	25-May-2007	27-Jul-2007	0.0 0.0 0.0 0.0 0.0 0.0 0.0 1.1	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$5	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$10
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Samplent Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	\$100 EstImated	25-May-2007	27-Jul-2007	entering 0.0 0.0 0.0 0.0 0.0 0.0 1.1	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$5 \$0 \$5 \$5	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 por recovery system	s0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$100 EstImated	25-May-2007	27-Jul-2007	entering 0.0 0.0 0.0 0.0 0.0 0.0 1.1	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$5 \$0 \$5 \$5	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	s0 \$0 \$0 \$0 \$0 \$0 \$0 \$105
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$100 EstImated	25-May-2007	27-Jul-2007	entering 0.0 0.0 0.0 0.0 0.0 0.0 1.1	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$5 \$0 \$5 \$5	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 por recovery system	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$105
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$100 EstImated	25-May-2007	27-Jul-2007	entering 0.0 0.0 0.0 0.0 0.0 0.0 1.1	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$5 \$0 \$5 \$5	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 por recovery system	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$105

Screening Date	16-Jul-2007	Docket N	o. 2007-1304-PST-E		PCW
Respondent	Sanya Investments, Inc. db	a Fina Food Mart		Policy Revision	2 (September 2002)
Case ID No.	34438			PCW Rei	vision June 26, 2007
Reg. Ent. Reference No.	RN101642759				
Media [Statute]	Petroleum Storage Tank				
Enf. Coordinator	Shontay Wilcher		•		
Violation Number	6				
Rule Cite(s)	30 Tex. Admin. Code §	115.248(1) and Tex. He	alth & Safety Code § 382.08	35(b)	
Violation Description	in the operation and mai current employee receiv	ntenance of the Stage II	tive receives training and in vapor recovery system, and or recovery training regardir age II equipment.	l each	
			Base	Penalty	\$10,000
>> Environmental, Property a	nd Human Health Mat	rix	ting to the same that the same and the same that the same		
	Harm	Minor			-
Release OR Actual	Major Moderate	Minor			
Potential	X		Percent 10%		
r otoridar			<u> </u>		
>>Programmatic Matrix			440		***************************************
Falsification	Major Moderate	Minor			
			Percent 0%		
Matrix Notes Human heal would not ex	th or the environment will or ceed levels that are protect	could be exposed to sig- ive of human health or er the violation.	nificant amounts of pollutan ivironmental receptors as a Adjustment	ts which result of	
	ladiyi.i.d. 1944 eta filoloofi bilaha 1944 ilibaha ada birish	n in the state of	2005.05.57.600.000.000.000.001.		\$1,000
,			•		\$1,000
Violation Events	a Proposition of the Control of the	promptos est a properties	Copyright Copyright Copyright	ructores Histor	manus de sussidades de la companya d
THE MARKET HE AND EXCELLENGED PROPERTY OF THE PARTY OF TH		na a cantalustra		. Do. Co. Clinities collection in ex-	
Number of Vio	olation Events 1	11_	Number of violation day	/S	***
		 1			
	daily				
may anh an	monthly guarterly x		Violation Base	e Penalty	\$1,000
mark only one with an x	semiannual		,		
	annual				
	single event				
-					
One quarte	erly event is recommended 2007 investigation	based on documentation date to the July 6, 2007 c	of the violation during the J ompliance date.	une 25,	
Economic Benefit (EB) for th	is violation		Statutory Limit Te	st.	
ECONOMIC SON SER BURGER (COME AND AND SERVICE SON OF METALLIC SERVICE	d EB Amount	\$1	Violation Final Pen	alty Total	\$1,142
					Ф4 44O
Ext. 8. September 2015		This violation Final As	sessed Penalty (adjusted t	ror limits)	\$1,142

Violation No.	Petroleum Stora 6	age Tank				Percent Interest	Years of Depreciation
		15.000.0000000000				5.0	1!
ltem Description	Item Cost No commas or \$	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	' EB Amount
Delayed Costs	en i stat i aneka i nam Kali sa ko elema	idali al'anti Communi		-1000	900000000000000000000000000000000000000		
Equipment	V 181			0.0	\$0	\$0	\$0
Buildings			dental services	0.0	\$0	\$0	\$0
Other (as needed)	editan depart			0,0	\$0	\$0	\$0
Engineering/construction				0,0	\$0	\$0	\$0
Land				0,0	\$0	n/a	\$0
Record Keeping System	\$500	25-Jun-2007	6-Jul-2007	0,0	\$1	n/a	\$1
Training/Sampling			dia	0.0	\$0	n/a	\$0
Remediation/Disposal		1		0,0	\$0	n/a	\$0
Permit Costs Other (as needed)	AND THE PROPERTY OF THE PARTY O			0.0	\$0 \$0	n/a , n/a	\$0 \$0
Notes for DELAYED costs					f compliance.	ed is the investigation	
Avoided Costs	ANN	IUALIZE [1] avoid	ed costs before er			one-time avoided o	
Disposal				0.0	\$0	\$0	\$0
Personnel		aland taking ili sel	Bulleting and second	0,0	\$0	\$0	\$0
				0.0	\$0 \$0	\$0 \$0	\$0
Inspection/Reporting/Sampling		the second of th		0.0	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/equipment	Live of the second second			0.0		\$0	
Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			Attached to the state of the st	0.0	I CO		en.
Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]				0.0	\$0 \$0		\$0 \$0
Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]				0.0	\$0	\$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]							\$0

Scre	ening Date	16-Jul-2007		Docket No	. 2007-1304-PST-E		PCW
	-	Sanya Investments,	Inc. dba Fina Food	Mart		Policy Revi	sion 2 (September 2002)
	Case ID No. :					PCN	/ Revision June 26, 2007
Reg. Ent. Re			'ank				
		Petroleum Storage T Shontay Wilcher	ank				1
	lation Number	7					
	Rule Cite(s)	30 Tex. Admin. Co	de § 115.246(1), (3	3), and Tex. He	alth & Safety Code § 38	2.085(b)	
	ř		``				
Violatio	on Description	immediately availa Respondent did not	ble for review upor maintain a copy of	n request by ag the California	t the Station and make the common the common that the control of t	ally, the	
					Bas	e Penalty	\$10,000
>> Environmenta	l, Property a	nd Human Healt Ha		TONGES CONTRACTOR			
	Release	Major Mode					
OR D	Actual Potential				Percent 0%		
>>Programmatic	Matrix.						•
rogrammatic	Falsification	Major Mode	erate Minor	 1			
engs et al fais traffa Assalas et est estas		x			Percent 10%		
Matrix Notes		1009	% of the rule requir	ement was not	met.		
					Adjustment	\$9,000	
							\$1,000
Violation Events	itali vii sa s	gram reversi minimizina deleni akirti. Akir	President	paparraselen pares. Samuelan samuel sellen	om contractions are supplied to		
			1	21	Number of violation da	ys	
:		daily [1				
		daily monthly					
	mark only one	quarterly			Violation Bas	se Penalty	\$1,000
	with an x	semiannual					
		annual single event	x 				
	One single e	vent is recommende	d based on docum investigation		violation during the June	25, 2007	
Economic Benef	it (EB) for thi	s violation			Statutory Limit Te	st	Para Para Para Para Para Para Para Para
	Estimated	I EB Amount		\$2	Violation Final Per	nalty Total	\$1,142
		Accessor	This violati	on Final Assa	ssed Penalty (adjusted	for limits)	\$1,142
Land Control State			i ins violati	5 I IIIdi A336		A back	Santi une

		conomic I	3enefit W	orks	heet	bk Nei all Schallere	A Language Spring
Respondent	Sanva Investme	ents, Inc. dba Fina i	=ood Mart		AND THE RESERVE OF THE PARTY OF	and Market Control of Part 1997	
Case ID No.		,					
Reg. Ent. Reference No.							
Media	Petroleum Stor	age Tank				Percent Interest	Years of
Violation No.	7	and the same of the same of			na error among ang ang ang ang ang ang ang ang ang a		Depreciation
					on a solid type province.	5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		1947		CAR SULTANIA		anagagagatan, an Ma	
item Description	I No commas or \$		235500000000000000000000000000000000000			944035E285	
P		SONO O CONTRACTOR OF THE STATE	prantice de Sentimone				
Delayed Costs		diakirt.	nerricalities detain	1 221	40		00
Equipment		Part of the second of the second	STANDARDANDER DE	0.0	\$0 \$0	\$0 \$0	\$0 \$0
Buildings	ik ja jurid (Cares I s		S. BARRIOTA	0.0	\$0 \$0	\$0	\$0
Other (as needed)	and his in Access of	1.0540.000.4	A CONTRACTOR OF THE SECOND	0.0	\$0 \$0	\$0	\$0
Engineering/construction	Laplica E. Line Henry	Law Laster Add	المناحة السائكين	0.0	\$0 \$0	n/a	\$0
Land	\$500	25-Jun-2007	27-Jul-2007	0.1	\$2	n/a	\$2
Record Keeping System Training/Sampling	\$500	20-Jun-2001	21-Jul-2001	0.0	\$0	n/a	\$0
raining/sampling Remediation/Disposal				0.0	\$0	n/a	\$0 \$0
		and the second second				CANADA CA	
	The second of the second second second	【报题集集、1、15.15、1.25年117年11日日本		ו ההו	\$O	n/a	\$0 I
Permit Costs Other (as needed)		Radio de la companio del companio de la companio del companio de la companio del companio del companio de la companio del companio del companio del companio de la companio del companio		0.0	\$0 \$0	n/a n/a	\$0 \$0
	Estimated cost	of maintaining requ	uired records. The	0.0	\$0 equired is the inve		\$0
Other (as needed) Notes for DELAYED costs			date	0.0 Date Re	\$0 equired is the inve	estigation date. The l	\$0 Final Date is the
Other (as needed) Notes for DELAYED costs Avoided Costs			date	0.0 Date Re of comp	equired is the inveliance.	n/a estigation date. The l	\$0 Final Date is the
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal			date	0.0 Date Re of comp	\$0 equired is the inveliance, item (except for	n/a estigation date. The l	\$0 Final Date is the
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel			date	Date Re of comp	\$0 equired is the invellance, item (except for \$0 \$0	estigation date. The last of t	\$0 Final Date is the sosts) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling			date	Date Re of comp Intering O.0 O.0 O.0 O.0 O.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0	stigation date. The I	\$0 Final Date is the sosts) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Suppiles/equipment			date	0.0 Date Reof componentering 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0	stigation date. The last stigation date avoided constitution so	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Suppiles/equipment Financial Assurance [2]			date	0.0 Date Re of comp Intering 0.0 0.0 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0	n/a stigation date. The last part of the stigation of the	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			date	0.0 Date Reof componentering 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0	stigation date. The last stigation date avoided constitution so	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Suppiles/equipment Financial Assurance [2]			date	0.0 Date Re of comp Intering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stigation date. The label of the stigation of the sti	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			date	0.0 Date Re of comp Intering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stigation date. The label of the stigation of the sti	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			date	0.0 Date Re of comp Intering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stigation date. The label of the stigation of the sti	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplles/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)			date	0.0 Date Re of comp Intering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stigation date. The label of the stigation of the sti	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplles/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)			date	0.0 Date Re of comp Intering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stigation date. The label of the stigation of the sti	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)			date	0.0 Date Re of comp Intering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	\$0 equired is the inveliance, item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a stigation date. The label of the stigation of the sti	\$0 Final Date is the sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screeni	ng Date 16-Jul-2007	Docket No	D. 2007-1304-PST-E	PCW
	ondent Sanya Investments, Inc	. dba Fina Food Mart		Policy Revision 2 (September 2002)
	e ID No. 34438			PCW Revision June 26, 2007
Reg. Ent. Refere	nce No. RN101642759			
	Statute] Petroleum Storage Tank	(
	dinator Shontay Wilcher			
	Number 8			
Ku	30 Tex. Admin. Coo	de § 115.245(2) and Tex. Hea	alth & Safety Code § 382.08	
				,
Violation De	Failed to verify prop months. Specifically,	per operation of the Stage II ed the Stage II annual complianc	quipment at least once eve ce testing had not been con	ry 12 ducted.
			Base	Penalty \$10,000
>> Environmental. Pr	operty and Human Health I	Vlatrix		,
	Harm		2442X355555515144555CC29464A3404148464	
OD	Release Major Modera	te Minor		
OR	Actual x		Percent 25%	
	T Otomical A			
>>Programmatic Mat		ALL AND THE STATE OF THE STATE		
Fa	Isification Major Modera	te Minor	Percent 0%	
			Percent 076	
	· · · · · · · · · · · · · · · · · · ·			
Matrix Hu Notes	man health or the environment will are protective of human	or could be exposed to pollule health or the environment as	tants which would exceed learners a result of the violation.	evels that
5 (Q1) 1		PHS. CONTRACTOR OF THE PROPERTY OF THE PROPERT	SHESSED ON EXPERIENCES SOLE (COMP	
	there is a section of the second		Adjustment	\$7,500
				\$2,500
	our conservation and conservation of the contract of the contr			
Violation Events			Minorio III de la Concestione de la co	Area Steenthall
	1	365	Number of violation day	/S
	<u>L</u>			
	daily			
	monthly		Violation Base	e Penalty \$2,500
m	ark only one quarterly with an x semiannual		Violation base	e relially \$2,000
	annual x			
	single event			
	■ Co. Clarks, A. Succión de Para Profession Profession			
	ne annual event is recommended f	as the 10 month nation proce	ding the June 25, 2007 inve	etigation
Or	ne annual event is recommended in	or the 12-month period preced	ding the June 25, 2007 inve	ssugation.
Economic Benefit (E	B) for this violation		Statutory Limit Te	
			5.05.2.1.050.00.00.00.00.00.00.00.00.00.00.00.00	
	Estimated EB Amount	\$1,096	Violation Final Pen	alty Total \$2,854

Case ID No. Reg. Ent. Reference No.	34438	ents, Inc. dba Fina				1818 - 1818 C	e n
	Petroleum Stor	age Tank				Percent Interest	Years of Depreciatio
and a substitute of the substi	e Habita				er die Kangare Weigenen	5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amoun
Item Description	No commas or \$			(4)			
Delayed Costs		and the state of the state of	Giriang Saula Livera ini-				
Equipment		an ing panggan		0,0	\$0	\$0	\$0
Buildings	MEGALETY STATE	HE CLOWNING	新种家的现在分词	0,0	\$0	\$0	\$0
Other (as needed)	rhillian, basil	Carrie Barrier		0.0	\$0	\$0	\$0
Engineering/construction	The state of the s		المناحث والمناحث	0,0	\$0	\$0	\$0
Land				0,0	\$0	n/a	\$0
Record Keeping System				0,0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal		The formation that		0,0	\$0	n/a	\$0
Permit Costs Other (as needed)	Transport description	Nistra de construito de la constanta de	Malies i i kiĝis libroli li laciarden	0.0	\$0 \$0	n/a n/a	\$0 . \$0
Notes for DELAYED costs				oleset		9866639	
Avoided Costs	ANN	IUALIZE [1] avoid	ed costs before e	ntering	item (except for	one-time avoided o	osts)
Disposal				0,0	\$0	\$0	\$0
Personnel				0,0	\$0	\$0	\$0.
Inspection/Reporting/Sampling			jaran tegli	0,0	\$0	\$0	\$0
Supplies/equipment	Lain Serie			0.0	\$0	\$0	\$0
Financial Assurance [2]			And the sales and the	0,0	\$0	\$0	\$0
ONE-TIME avoided costs [3]	et og et pet ble i be	Light gath, it lifting to Many to		0,0	\$0	\$0	\$0
Other (as needed)	\$1,000	25-Jun-2006	25-Jun-2007	1.9	\$96	\$1,000	\$1,096
Notes for AVOIDED costs	Estimate		esting of the Stage estigation, The Fin			equired is one year i date.	

Scre	ening Date	16-Jul-2007	*****************	D	ocket No	D. 2007-1304-PST	-E	PCW
R	espondent	Sanya Investr	ments, Inc. db	a Fina Food M	art		Policy Re	vision 2 (September 2002)
C	ase ID No.	34438					PC	W Revision June 26, 2007
Reg. Ent. Ref								
		Petroleum Sto						
		Shontay Wilc	her					
Viola	ition Number	9						
	Rule Cite(s)	30 Tex. Ad	lmin. Code §	115.242(1)(C) a	and Tex. He	ealth & Safety Code	e § 382.085(b)	
·		Failed to und	ate the Stane	Il vanor recove	arv system	to onboard refuelin	a vanor recovery	
Violation	n Description	aned to upu	ate the olage	(ORVR) cor			g vapor recovery	
						•	Base Penalty	\$10,000
>> Environmental	, Property a	ınd Human	Health Mat	rix	fore on 121.315.	San Sharakan Sharakan San Sharakan Sharakan		
	Release	Major	Moderate	Minor				
OR	Actual					·····		
No. (Asia) 200	Potential		X			Percent	10%	
>>Programmatic I	Matrix		Annual State (1)	1.00 Marsa				
And College Steel	Falsification	Major	Moderate	Minor	at is learned that a			
						Percent	0%	
Matrix Notes					ealth or env	ificant amounts of vironmental receptor		
	<u> </u>							
	ade de la desemblación de la desemble	Januaria Januaria	ALTO CONTRACTOR			Adjustment	\$9,000	
							Possesses and A	\$1,000
Violation Events	and seed to be	raya na manazarrasana dada Kasaarran madan	aksi ali karatan da santi galah da saran ya Ani ani karatan da santi galah da saran ya ka	enise ogskyzieseset Pompodiekinieseti	agas Assaul o ga as Beltabagas salikiki ib	esi uma este erropes Modeles indices de este este incide	ng parasubar danang aking Kabapasan kabapatan dana	
	Number of Vio	olation Events	1	la de la constanta de la const	21	Number of viola	tion days	
		daily monthly						
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Compliance History

Customer	/Respondent/Owner-Operator:	CN600883243	Sanya Investments, I	nc.	Classification: AV	ERAGE	Rating: 1.00
Regulated	Entity:	RN101642759	SANYA INVESTMEN FOOD MART	NT DBA FINA	Classification: AVE	RAGE	Site Rating: 1.00
ID Numbe	or(s):	PETROLEUM ST		REGISTE	RATION	2	6260
Location:			IT RD, GRAND PRAIRIE	Ξ, TX, 75050	Rating Date: Septe	ember 01 06	Repeat Violator: N
TCEQ Re	gion:	REGION 04 - DF	W METROPLEX				,
Date Com	pliance History Prepared:	August 13, 2007					
Agency D	ecision Requiring Compliance History:	Enforcement					
Complian	ce Period:	August 13, 2002	to August 13, 2007				
TCEQ Sta	off Member to Contact for Additional Info		this Compliance History one: (512) 239-2	2136		1	
		Site C	compliance History (Components			
1. Has the	e site been in existence and/or operation	for the full five year	compliance period?	Yes			•
	ere been a (known) change in ownership	of the site during the	ne compliance period?	No			
	who is the current owner?			N/A			
4. if Yes,	who was/were the prior owner(s)?			N/A			
5. When	did the change(s) in ownership occur?			N/A			
Compor	nents (Multimedia) for the Site :						
A.	Final Enforcement Orders, court judge	ments, and consent	decrees of the state of	Texas and the fede	ral government.		
	N/A						
В.	Any criminal convictions of the state of	Toyas and the fede	aral government				
Б.	N/A	Texas and the rede	ara government.		•		
C.	Chronic excessive emissions events.						
	N/A		•				
D.	The approval dates of investigations. (CCEDS Inv. Track.	No.)				
	N/A 1 11/25/2002 (17405) 2 03/07/2003 (26953) 3 07/02/2007 (565624)					·	
E.	Written notices of violations (NOV). (C	CEDS Inv. Track. N	o.)				
	Date: 11/22/2002 (17405						
		apter 115, SubChap uccessfully verify pro			least every		
F.	Environmental audits. N/A						
G.	Type of environmental management s	ystems (EMSs).					
	N/A	,					
Н.	Voluntary on-site compliance assessm	ent dates.					
	N/A						
l.	Participation in a voluntary pollution re	duction program.					
	N/A						
J.	Early compliance.						
	N/A						
Sites Out	tside of Texas						÷

N/A

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON ,
SANYA INVESTMENTS, INC. DBA	§	
FINA FOOD MART	§	
RN101642759	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2007-1304-PST-E

I. JURISDICTION AND STIPULATIONS

At its ______ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Sanya Investments, Inc. dba Fina Food Mart ("Sanya Investments") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and Sanya Investments appear before the Commission and together stipulate that:

- 1. Sanya Investments owns and operates a convenience store with retail sales of gasoline at 1821 West Tarrant Road in Grand Prairie, Dallas County, Texas (the "Station").
- 2. Sanya Investments' two underground storage tanks ("USTs") are not exempt or excluded from regulation under the Texas Water Code or the rules of the Commission. The Station consists of one or more sources as defined in Tex. Health & Safety Code § 382.003(12).
- 3. The Commission and Sanya Investments agree that the Commission has jurisdiction to enter this Agreed Order, and that Sanya Investments is subject to the Commission's jurisdiction.
- 4. Sanya Investments received notice of the violations alleged in Section II ("Allegations") on or about July 11, 2007.
- 5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Sanya Investments of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative penalty in the amount of Thirteen Thousand Seven Hundred Dollars (\$13,700) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Sanya Investments has paid Three Hundred Ten Dollars (\$310) of the administrative penalty and Two Thousand Seven Hundred Forty Dollars (\$2,740) is deferred contingent upon Sanya Investments' timely and satisfactory compliance with all the terms of this Agreed Order. If Sanya Investments fails to timely and satisfactorily comply with all requirements of this Agreed Order, including the payment schedule, the Executive Director may require Sanya Investments to pay all or part of the deferred penalty.

The remaining amount of Ten Thousand Six Hundred Fifty Dollars (\$10,650) of the administrative penalty shall be payable in 34 monthly payments of Three Hundred Ten Dollars (\$310) each and one final payment of One Hundred Ten Dollars (\$110). The next monthly payment shall be paid within 30 days after the effective date of this Agreed Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until paid in full. If Sanya Investments fails to timely and satisfactorily comply with the payment requirements of this Agreed Order, the Executive Director may, at the Executive Director's option, accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. In addition, the failure of Sanya Investments to meet the payment schedule of this Agreed Order constitutes the failure by Sanya Investments to timely and satisfactorily comply with all the terms of this Agreed Order.

- 7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director of the TCEQ and Sanya Investments have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
- 9. The Executive Director recognizes that Sanya Investments has implemented the following corrective measures at the Station:
 - a. Properly anchored the shear valves on dispenser nos. 1/2, 3/4, and 5/6 on June 28, 2007;
 - b. Began conducting daily and monthly inspections of the Stage II vapor recovery system on July 27, 2007;
 - c. Submitted documentation verifying that all current employees completed in-house Stage II vapor recovery training on July 6, 2007;
 - d. Began maintaining the required Stage II records at the Station on July 27, 2007;
 - e. Conducted the annual testing of the Stage II equipment on June 25, 2007 and the system passed; and
 - f. Upgraded the Stage II vapor recovery system to onboard refueling vapor recovery ("ORVR") compatible system on July 30, 2007.
- 10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the

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Executive Director determines that Sanya Investments has not complied with one or more of the terms or conditions in this Agreed Order.

- 11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Station, Sanya Investments is alleged to have:

- 1. Failed to provide a release detection method capable of detecting a release from any portion of the UST system which contained regulated substances, in violation of 30 Tex. ADMIN. CODE § 334.50(a)(1)(A) and Tex. WATER CODE § 26.3475(c)(1), as documented during an investigation conducted on June 25, 2007.
- 2. Failed to properly install and maintain a secure anchor at the base of each UL-listed emergency shutoff valve in a piping system in which regulated substances are conveyed under pressure to an aboveground dispensing unit, in violation of 30 Tex. ADMIN. CODE § 334.45(c)(3)(A), as documented during an investigation conducted on June 25, 2007. Specifically, the shear valves were not properly anchored under dispenser nos. 1/2, 3/4, and 5/6.
- 3. Failed to provide an amended registration for any change or additional information regarding USTs within 30 days from the date of the occurrence of the change or addition, in violation of 30 Tex. ADMIN. Code § 334.7(d)(3), as documented during an investigation conducted on June 25, 2007. Specifically, the registration was not updated to reflect the current release detection method and tank capacity for the USTs at the Station.
- 4. Failed to ensure that a legible tag, label, or marking with the tank number is permanently applied upon or affixed to either the top of the fill tube or to a nonremovable point in the immediate area of the fill tube according to the UST registration and self-certification form, in violation of 30 Tex. Admin. Code § 334.8(c)(5)(C), as documented during an investigation conducted on June 25, 2007.
- 5. Failed to conduct daily and monthly inspections of the Stage II vapor recovery system, in violation of 30 Tex. ADMIN. CODE § 115.244(1), (3), and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on June 25, 2007.
- 6. Failed to ensure that at least one Station representative receives training and instruction in the operation and maintenance of the Stage II vapor recovery system, and each current employee receives in-house Stage II vapor recovery training regarding the purpose and operation of the Stage II equipment, in violation of 30 Tex. ADMIN. CODE § 115.248(1) and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on June 25, 2007.

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Sanya Investments, Inc. dba Fina Food Mart DOCKET NO. 2007-1304-PST-E Page 4

- 7. Failed to maintain all required Stage II records at the Station and make them immediately available for review upon request by agency personnel, in violation of 30 Tex. ADMIN. CODE § 115.246(1), (3), and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on June 25, 2007. Specifically, Sanya Investments did not maintain a copy of the California Air Board Executive Order and the maintenance records for the Stage II vapor recovery system.
- 8. Failed to verify proper operation of the Stage II equipment at least once every 12 months, in violation of 30 Tex. ADMIN. CODE § 115.245(2) and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on June 25, 2007. Specifically, the Stage II annual compliance testing had not been conducted.
- 9. Failed to update the Stage II vapor recovery system to ORVR compatible system, in violation of 30 Tex. ADMIN. CODE § 115.242(1)(C) and Tex. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on June 25, 2007.

III. DENIALS

Sanya Investments generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Sanya Investments pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Sanya Investments' compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Sanya Investments, Inc. dba Fina Food Mart, Docket No. 2007-1304-PST-E" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. It is further ordered that Sanya Investments shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order:
 - i. Install and implement a release detection method for all USTs at the Station, in accordance with 30 TEX. ADMIN. CODE § 334.50;
 - ii. Submit an amended UST registration form to indicate the current release detection method and capacity of the UST system, in accordance with 30 Tex. ADMIN. CODE § 334.7; and

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- iii. Appropriately mark the top of each fill tube or nonremovable point in the immediate area of the fill tube of each UST, in accordance with 30 TEX. ADMIN. CODE § 334.8.
- b. Within 45 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a.i through 2.a.iii. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Waste Section Manager Dallas/Fort Worth Regional Office Texas Commission on Environmental Quality 2301 Gravel Drive Fort Worth, Texas 76118-6951

- 3. The provisions of this Agreed Order shall apply to and be binding upon Sanya Investments. Sanya Investments is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Station operations referenced in this Agreed Order.
- 4. If Sanya Investments fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Sanya Investments' failure to comply is not a violation of this Agreed Order. Sanya Investments shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Sanya Investments shall notify the Executive Director within seven days after Sanya Investments becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Sanya Investments shall be

Sanya Investments, Inc. dba Fina Food Mart DOCKET NO. 2007-1304-PST-E Page 6

made in writing to the Executive Director. Extensions are not effective until Sanya Investments receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

- 6. This Agreed Order, issued by the Commission, shall not be admissible against Sanya Investments in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 7. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
- 8. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Sanya Investments, or three days after the date on which the Commission mails notice of the Order to Sanya Investments, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	
20 On Sallier	$\frac{1/29/2008}{\text{Date}}$
For the Executive Director	Date
attached Agreed Order on behalf of the	tand the attached Agreed Order. I am authorized to agree to the entity indicated below my signature, and I do agree to the terms her acknowledge that the TCEQ, in accepting payment for the such representation.
 timely pay the penalty amount, may result A negative impact on compliance Greater scrutiny of any permit appenalties, and/or attorney fees, or Increased penalties in any future of Automatic referral to the Attorney TCEQ seeking other relief as auth 	c history; plications submitted; rney General's Office for contempt, injunctive relief, additional to a collection agency; enforcement actions; y General's Office of any future enforcement actions; and horized by law.
In addition, any falsification of any comp	liance documents may result in criminal prosecution.
Signature	Date
D. Nayab Whan	gwnir
Name (Printed or typed)	Title
Authorized Representative of Sanya Investments, Inc. dba Fina Food M	lort
banya mivesunenis, mc. dua fina food M	latt

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.